

**CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

W.K., E.H., M.M., R.P., M.B., D.P.,  
A.F., C.A., R.K., K.P., and T.H.,

Plaintiffs,

v.

RED ROOF INNS, INC., FMW RRI  
NC, LLC, RED ROOF  
FRANCHISING, LLC, RRI WEST  
MANAGEMENT, LLC, VARAHI  
HOTEL, LLC, WESTMONT  
HOSPITALITY GROUP, INC., and  
RRI III, LLC,

Defendants.

**PL Sum. J.**

**Ex. 070**

CIVIL ACTION FILE

NO. 1:20-cv-5263-MHC

JURY TRIAL DEMANDED

Pursuant to Fed. R. Civ. P. 38

**PLAINTIFF C.A.'S OBJECTIONS AND RESPONSES TO  
DEFENDANT RED ROOF INNS, INC.'S FIRST INTERROGATORIES**

Plaintiff C.A. ("C.A." or "Plaintiff") hereby provides objections and responses to Defendant Red Roof Inns, Inc.'s First Interrogatories (the "Interrogatories"). Plaintiff reserves the right to amend and supplement these responses as discovery progresses. Plaintiff states that, in these responses, she provides the identity of Victims of Sex Trafficking only subject to the Court's June 4, 2021 Protective Order (Doc. 74). Under this Order, during the pre-trial proceedings in this litigation and in any public filings,

**CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER**

Her trafficking began when she met a group of sex traffickers that identified themselves as “PIVIP” in 2008 while she was living with her mother at The Point apartment complex in Dunwoody. One of the PIVIP traffickers who went by the name “Fresh” lived in the same complex. He and other members of the group, including Nitty, Kwan, and Bagz, encouraged her to engage in commercial sex and made her believe she could have a glamorous life if she did so. C.A. then met a woman named Marissa, who was an associate of the PIVIP traffickers, who convinced her to engage in commercial sex with the PIVIP traffickers.

At first, C.A. thought she was a willing participant, but she was immediately forced to give her traffickers the money she collected from engaging in commercial sex and her traffickers exercised control over her daily activities. During this time, C.A. had no car and was not allowed to travel freely. Instead, the traffickers would bring food to the hotel rooms. She now realizes that she was manipulated by her traffickers.

C.A.’s first trafficker was Kwan, who trafficked C.A. at the Red Roof Inn on North Druid Hills in about October or November of 2009. C.A. very quickly “chose up” (changed traffickers) to Fresh. She chose to work with

**CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER**

Fresh because she knew him from her mother's apartment complex and she thought he was safer.

Fresh then forced C.A. to engage in commercial sex with buyers at various hotels in the Atlanta area, and Fresh would keep all the money she collected. If C.A. did collect a minimum amount of money, Fresh would require that she keep having sex until she did. Fresh would occasionally use physical force or threats of force to keep C.A. in line. Typically, when she was trafficked during this time, there were other victims also being trafficked by Fresh or some of Fresh's associates.

From about October 2009 through 2013, C.A. was trafficked either by Fresh or Bagz, both of whom were part of the PIVIP group. Just as with Fresh, with Bagz, C.A. was forced to engage in commercial sex and required to give the money collected to the trafficker. Bagz was more violent than Fresh, and if C.A. failed to meet the quota that Bagz demanded, Bagz would use physical force against her. Bagz also used physical force against C.A. for other reasons. For example, if C.A. spoke to other sex trafficking victims in a way that Bagz did not approve, Bagz would beat her. Bagz was very violent, once beating C.A. in the face so hard that her face split open and C.A.'s friend, [REDACTED], had to bandage it up.

**CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER**

Bagz showed obvious signs that he was a pimp, dressing in very expensive clothes and surrounding himself with young women whom he called “ho” or “bitch” in front of others, including in the lobby of the hotels where C.A. was trafficked.

C.A. was trafficked by Bagz and Fresh at various locations up and down the east coast, from as far south as South Florida and as far north as Baltimore, Maryland. At some point in 2011, C.A. met K.P, who was also trafficked for commercial sex. By the middle of 2011, C.A. essentially lived at the ESA-Peachtree Road, located at 3967 Peachtree Road, for a few months, where she was trafficked for sex.

In about September 2011, C.A. became pregnant with a child whom she thinks was Bagz’s. C.A. told Bagz that she thought the child was his. Around this time, Bagz beat her. She continued to be trafficked by both Fresh and Bagz at various locations while she was pregnant. She gave birth to her daughter in June 2012 and then continued to be trafficked again. Her trafficking continued with Bagz until he got arrested at a raid in his home in Sandy Springs in 2012. At that point, she began to be trafficked by Fresh again. She was then trafficked by Fresh for a while, but at some point she

**CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER**

- [REDACTED] (Last name unknown)
- [REDACTED] (Last name unknown)

At times, Bagz would rent two to three rooms at a time, while standing with multiple, scantily-clad women wearing high heels. Bagz also referred to the women he was with as “ho” or “bitch.” Based on his appearance, how he interacted with the multiple women around him, and the number of other men coming and going from the rooms Bagz rented, the employees at this hotel would have known that Bagz was trafficking women for sex.

C.A. saw some of the employees at this hotel get into the cars of the traffickers to buy drugs. C.A. believes that Bagz and his associates regularly sold drugs to hotel employees at this hotel.

Although Bagz often rented the rooms at this hotel, C.A. recalls that she may have used her own identification to rent a room as well. During the time she was trafficked at this hotel, C.A. stayed in different rooms on different floors.

**ESA HOTELS:** C.A. was trafficked at the following ESA hotels:

- ESA-Clairmont
- ESA-Crestline
- ESA-Cumberland
- ESA-Hammond
- ESA-Jimmy Carter
- ESA-Peachtree Road

**CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER**

- ESA-Peachtree Dunwoody
- ESA-2010 Powers Ferry
- ESA-2239 Powers Ferry
- ESA-Old Milton
- ESA-Baton Rouge

While she was trafficked at these ESA hotels, the signs of sex trafficking were open and obvious. For example, C.A. and other sex trafficking victims were often dressed in sexually suggestive clothing and were seen with multiple buyers throughout the day. The constant stream of male buyers to C.A.'s room and the rooms of other sex trafficking victims, for stays of about an hour each, was a sure sign of commercial sex activity. The trashcans in the rooms where C.A. stayed would fill with used condoms that housekeeping would dispose of. And C.A. and other sex trafficking victims requested a large volume of extra towels and bed sheets because of the commercial sex activity occurring in the room.

The sex trafficking victims themselves, including C.A., showed obvious signs that they were subject to force, fraud or coercion. For example, C.A. and other victims would not generally make eye contact with others. They would often walk behind their pimps (who were dressed in loud clothing and surrounded by young girls and women dressed inappropriately for their age). And C.A. and other victims even showed physical signs of sex trafficking,

**CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER**

clinic, public health department or facility, or similar medical or psychological provider. Plaintiff's traffickers generally did not allow her to seek medical attention for injuries. C.A. recalls, however, on or about April 28, 2013, she went to St. Joseph's hospital for a broken nose and saw Dr. Kenneth Joel Miller, M.D.

C.A. also states that she may have received medical care for the physical, mental, and emotional injuries she suffered during her trafficking, including trafficking at the Atlanta RRI, from the following providers:

- Sober Living, Delray Beach, Florida
- The Beachcomber, Delray Beach, Florida
- The Link Counseling in Sandy Springs, Georgia
- Dunwoody Wellcare
- Peachtree Women's Clinic
- Northside/Northpoint OBGYN, Dr. Anissa Durairaj
- Dunwoody Village Piedmont Urgent Care by WellStreet
- Dr. Asaf Alleem, Psychiatrist, Dunwoody, Georgia
- Physicians Immediate Med, Alpharetta, Georgia

C.A. states that she will conduct a reasonable search for and produce, if any, non-privileged documents sufficient to show her injuries.

**INTERROGATORY NO. 15: Please list and itemize, by expense or element, all general and special damages that you seek to recover for the allegations contained in your Second Amended Complaint.**

**RESPONSE TO INTERROGATORY NO. 15:** Plaintiff states that she will conduct a reasonable search for and will produce, if any, non-privileged



**CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

W.K., E.H., M.M., R.P., M.B., D.P.,  
A.F., C.A., R.K., K.P., and T.H.,

Plaintiffs,

v.

RED ROOF INNS, INC., FMW RRI  
NC, LLC, RED ROOF  
FRANCHISING, LLC, RRI WEST  
MANAGEMENT, LLC, VARAHI  
HOTEL, LLC, WESTMONT  
HOSPITALITY GROUP, INC., and  
RRI III, LLC,

Defendants.

CIVIL ACTION FILE

NO. 1:20-cv-5263-MHC

JURY TRIAL DEMANDED

Pursuant to Fed. R. Civ. P. 38

**VERIFICATION**

The answers set forth in **PLAINTIFF C.A.'S OBJECTIONS AND RESPONSES TO DEFENDANT RED ROOF INNS, INC.'S FIRST INTERROGATORIES** are true and correct to the best of my knowledge, information and belief based on the information currently available to me. I reserve the right to make changes to these Objections and Responses if it appears that an error or omission has been made therein or if more information becomes available.



**CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER**

Respectfully submitted this 18<sup>th</sup> day of August, 2021.

/s/

John

Geor

floyd

Tiana S. Mykkeltvedt

Georgia Bar No. 533512

mykkeltvedt@bmelaw.com

Manoj S. Varghese

Georgia Bar No. 734668

varghese@bmelaw.com

Amanda Kay Seals

Georgia Bar No. 502720

seals@bmelaw.com

Michael R. Baumrind

Georgia Bar No. 960296

baumrind@bmelaw.com

BONDURANT, MIXSON & ELMORE, LLP  
1201 West Peachtree Street, N.W., Suite 3900  
Atlanta, Georgia 30309  
(404) 881-4100 – Telephone  
(404) 881-4111 – Facsimile